

**REMARKS**

Claim 1-10 are pending in the present application, of which claims 1-5 and 8 have been withdrawn pursuant to 35 USC 121. Accordingly, claims 6, 7, and 9-10 are currently under consideration and the following remarks relate to these claims.

Applicant hereby affirms the election of Group II, claims 6 and 7, with traverse. Applicant also submits that new claims 9 and 10 should also be included in this group.

Claim 6 was amended to more clearly define the invention. In particular, claim 6 was amended to recite that the water is heated by a heater which is fed to the injection molding machine and returned to the heater in the first step of claim 6. The claim was also amended to clarify that the water from the cooling tower is used for the purpose of cooling the injection molding machine. Adequate written descriptive support for these amendments should be apparent from the detailed specification. For example, on page 7, with reference to Figure 2, Applicant explains that a heater heats the feed water supplied from the cooling tower by pump 3 which is supplied to pipe 2 and subsequently to the injection molding machine. (See page 6, lines 1-5) The water then moves through a series of pipes to the injection molding machine and can be returned to pump 3 and the heater by a series of valves. (See page 6, lines 6-13) The structure for cycling the heated water is also shown in Figs. 1 and 2. A further discussion of the heating function is described on page 9, beginning at line 11, which describes preheating the injection molding machine. New claims 9 and 10 are also supported by the disclosure in these pages. Accordingly, it is respectfully submitted that no new matter has been added to the application by the amendments to the claims.

The specification was also amended at pages 6 and 8 to correct typographical errors as evidenced by the figures. Accordingly, it is respectfully submitted that this amendment to the specification does not add new matter.

Fig. 2 was also revised to identify the injection molding machine in the figure by numeral 1. Due to the nature of this amendment, it is respectfully submitted that no new matter is added to the drawing.

#### **In the Specification**

The specification was objected to because of typographical errors. Applicant has corrected the specification as noted by the Examiner. Accordingly, reconsideration and withdrawal of the objections are respectfully solicited.

#### **In the Drawings**

Figure 2 was objected to because it did not identify the injection molding machine as numeral 1. Applicant has corrected Fig. 2 by including the numeral 1 which identifies the injection molding machine in the figure. Accordingly, reconsideration and withdrawal of the objection are respectfully solicited.

#### **Rejection Under 35 USC 103**

Claims 6 and 7 were rejected under 35 USC 103 as being unpatentable over Arai (5,591,385) taken together with Kemerer (5,167,781). The rejection is traversed and it is respectfully submitted that the claims now under consideration are patentable within the meaning of 35 USC 103.

Independent claim 6 relates to a method for controlling a temperature of an injection molding machine. The claim requires that water is heated by a heater which is fed to the injection molding machine and returned to the heater to control a temperature of the feed water. Dependent claims 7 and 9 further define aspects of the method.

Independent claim 10 also relates to a method for controlling the temperature of an injection molding machine. Claim 10 requires a preheating step which includes supplying heated water to the machine and returning the water to a heater which is returned to the machine for a set period of time.

Neither cited reference, individually or combined, suggests heating an injection molding machine by recycling heated water to the machine from a heater, let alone independent claims 6 or 10. Indeed, Arai does not teach heating an injection molding machine in any sense. Arai, as noted on column 12, with reference to Fig. 1, teaches supplying a coolant such as factory water to a chiller 33 which can be heated by controller 6 which is then branched by branching unit 12 and sent to mold 2. The coolant is then discharged from the mold by return line 9b. As is apparent in Fig. 1, there is no means to isolate the chiller and simply heat the injection molding machine by recycling the coolant through the heater. Nowhere in the disclosure of Arai is there such a suggestion either. The secondary reference does not cure this deficiency. Accordingly, it is respectfully submitted that the combined references do not teach or suggest the subject matter of claims 6 or 10.

Based on the foregoing, it is respectfully submitted that claims 6, 7 and 9-10 are patentable within the meaning of 35 USC 103 over the cited art. Accordingly, favorable consideration and allowance of the application are respectfully solicited.

09/922,930

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Daniel Bucca", with a long, sweeping horizontal line extending to the right.

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